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January 23, 2024

Via ECF and Email: shl.orders@nysb.uscourts.gov

Honorable Sean H. Lane
United States Bankruptcy Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

**Re: *Business Finland USA, Inc. v. Jaana Colangelo*
SDNY Adv. Pro. No. 23- 07036 (SHL)**

Dear Judge Lane:

As you are aware, this firm represents Business Finland USA, Inc. (“Business Finland”), plaintiff in the above referenced Adversary Proceeding. This letter is written in response to the recent filings of Debtor/Defendant Jaana Colangelo (“Colangelo”).

On January 22, 2024, a document titled “Answer for the summons” dated January 17, 2024 was filed on behalf of Colangelo (the “Answer”, ECF No. 4). The Answer is unresponsive to any of the allegations in the Complaint and states no defenses. Further, the Answer is redundant, immaterial, impertinent, and scandalous.

Instead of responding to the Complaint, Colangelo uses the Answer to make defamatory statements, implication, and insinuations against Business Finland and its employees, all of which are categorically false. These allegations were previously presented by Colangelo in the State Court, which found them to be without any merit and instead determined that Colangelo misappropriated Business Finland’s funds.

The following date, on January 23, 2024, Colangelo filed a letter requesting an extension of time to file an answer (the “Letter Requesting Extension”, ECF No. 4). It is unclear whether or not Colangelo intends her Answer filed on January 22, 2024 to be her response to the Complaint, or if she wishes to file another document as her “Answer”.

Honorable Sean H. Lane
U.S. Bankruptcy Judge, SDNY
Business Finland USA, Inc. v. Jaana Colangelo
Adv. Pro. No. 23-07036 (SHL)
January 23, 2024
Page 2

The undersigned awaits this Court's guidance on this matter at the upcoming hearing on January 31, 2024. Should you have any questions, please do not hesitate to have your Honor's Chambers contact the undersigned. Business Finland thanks the Court for its time and assistance in this matter.

Respectfully submitted,

/s/ Julie Cvek Curley
Julie Cvek Curley

JCC/

cc: Jaana Colangelo (*Via Email*)